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November 1, 1999

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street SW
Room TW-A325
Washington, DC 20554

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Dear Ms. Salas:

Enclosed please find reply comments on behalf of the American Society for Deaf Children (ASDC) on Closed Captioning Requirements for Digital Receivers, ET Docket No. 99-254.

If ASDC can assist you in any way in this matter, please do not hesitate to contact us. Thank you for the opportunity to comment.

Very truly yours,



Barbara Raimondo
Director, Public Affairs

Enclosures

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Before the
Federal Communications Commission
Washington, DC

In the Matter of	(
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for Digital Television Receivers	(

**Reply Comments of the
American Society for Deaf Children**

American Society for Deaf Children
P.O. Box 1510
Olney, MD 20830
November 1, 1999

Before the
Federal Communications Commission
Washington, D.C.

In the Matter of
Closed Captioning Requirements
for Digital Television Receivers

Comments of the
American Society for Deaf Children

Introduction

The American Society for Deaf Children (ASDC) hereby submits reply comments on the Notice of Proposed Rulemaking issued by the Federal Communications Commission (FCC) on July 14, 1999 regarding Closed Captioning Requirements for Digital Television Receivers, ET Docket No. 99-254.

ASDC is a national organization of families and professionals committed to educating, empowering and supporting parents and families to create opportunities for their children who are deaf and hard of hearing in gaining meaningful and full communication access, particularly through the competent use of Sign Language, in their home, school, and community. ASDC's primary mission is to assure the highest quality programs and services for parents in making sound and informed choices to meet their children's educational, communication, personal and social needs so that they may fully participate in the global community now and in the 21st century.

ASDC has commented on and read with great interest the proposed and final rules issued by the FCC pertaining to closed captioning, 711 access for relay services, Section 255 access to telecommunications products and services, and numerous other proceedings which promote accessibility for our deaf and hard of hearing children. ASDC is enthusiastic about the gains that have been made. Our children's future educational and employment success depends to a large extent on this access. ASDC thanks and commends the FCC for its leadership in these areas.

ASDC is aware that changes in technology are moving television broadcasting from the analog to the digital format in the coming years. For this reason, it is necessary for the FCC to develop a new closed captioning

standard for digital equipment. ASDC believes that the standard being proposed by the FCC should take advantage of new digital technologies.

The Electronics Industry Alliance has developed a standard, EIA-708, that will enable caption viewers to control the font, color, size, and placement of captions. Indeed, this is the advantage of digital technologies - they will enable viewers to have much more control over the captions that they watch. ASDC believes that the FCC should adopt EIA-708 in its entirety. ASDC was disappointed to learn that the Commission's proposed rules do not propose to adopt EIA-708 in full. Rather, the proposed rules only adopt a portion of EIA-708, Section 9. Very little in the proposed standard will enable viewers to take advantage of the new digital technologies. The failure to adopt a standard that incorporates all access features during the design stages of this new digital equipment is shortsighted. Further, if the FCC adopts only Section 9 and not the whole EIA-708 standard, the FCC will be taking action that conflicts with the policies stated in its own new Section 255 rules. These rules require manufacturers to incorporate access as early and as consistently as possible in the design stages of manufacturing equipment.

The FCC should include the following recommendations in its standard.

Size of Captions: The existing FCC caption standard does not provide the ability to change the size of closed captions. This has been a problem for individuals with low vision, including many senior citizens. New digital technologies (and the EIA-708) enable viewers to control the size of captions. This is often referred to as "caption volume control." But the standard proposed by the FCC contained in Section 9 only recommends one standard size of captions. The FCC should adopt the full EIA-708 standard, which will allow viewers to alter the size of captions.

Color: Section 9 would only require decoders to use solid black backgrounds. In contrast, EIA-708 as a whole would permit users to choose from a variety of foreground and background colors, so that viewers can create contrasts against various backgrounds. Again, the proposed standard is unnecessarily limiting.

Font: Section 9 proposes only one font, while EIA-708 would permit viewers to choose from among eight different fonts. The FCC should adopt a standard that offers viewers the greatest number of choices available with the new digital technologies.

Number of Captioning Services: The FCC's rules currently require decoders to be capable of decoding captioning data for two captioning services at the same time. In fact, most TV receivers can decode up to four captioning streams. (This is how certain TV sets can receive captions in both English and Spanish, such as on CBS's *60 Minutes*.) The proposed standard - Section 9 - would only require decoders to decode and process data for one captioning service. This is not only too limiting; it actually takes a step backward. The FCC should adopt a standard that requires digital television equipment to decode all of the standard and extended digital services (six standard services and up to 57 additional extended services).

Dual Mode Receivers: ASDC supports the FCC's proposal to require DTV receivers to operate in a dual mode, allowing the decoding of programming sent in both analog and digital formats. This will be important as we go through the transition from analog to digital TV.

DTV Converter Boxes and Tuners: ASDC supports the FCC's proposal to require DTV converter boxes and tuners to decode closed captions in either the analog or digital format. This should be required regardless of the size of the television to which the converter or tuner is connected.

The FCC should promulgate the following additional standards.

The FCC should take this opportunity to fix some existing problems with television receivers vis-a-vis the processing and display of closed captions. Specifically, the FCC should create the following mandates.

1. If captions are chosen by the viewer, they should not cut off when the television is turned off or the channel is changed. In other words, consumers should not have to continually turn on captions each time they turn on the TV or change a channel - rather if captions are chosen, that choice should become the default mode.
2. The captioning feature and the mute feature should not be connected. A viewer should not have to turn on mute to receive captions. This makes it impossible for mixed (hearing and deaf/hard of hearing) audiences to watch television together.
3. It should be easy to access captions through a button on the remote, and through a first menu of choices. Viewers should not have to go through long menu mazes to figure out how to obtain captions. This is particularly important in hotels and other locations where the viewer is not familiar with the television equipment. Numerous caption users can attest to the

difficulty of trying to figure out how to display captions on an unfamiliar television, often giving up in frustration.

Conclusion

Again, ASDC commends the FCC on steps it has taken to promote accessibility for deaf and hard of hearing persons. ASDC urges the FCC to continue in that vein. On behalf of our deaf and hard of hearing children, ASDC urges the FCC to adopt EIA-708 in its entirety.

Thank you for your consideration. If we may be of assistance in any way, please do not hesitate to contact us.

Respectfully submitted,

Barbara Raimondo
Director, Public Affairs